

1 STEVEN G. KALAR
Federal Public Defender
2 ANGELA M. HANSEN
Assistant Federal Public Defender
3 555 - 12th Street, Suite 650
Oakland, CA 94607-3627
4 Telephone: (510) 637-3500
5 Counsel for Defendant WILLIAMS

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION

10 UNITED STATES OF AMERICA,)	No. CR-12-00600 YGR
)	
11 Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	HEARING DATE TO DECEMBER 20,
12 v.)	2012 AND TO EXCLUDE TIME UNDER
)	THE SPEEDY TRIAL ACT AND ORDER
13)	
14 DERON MATUKOL WILLIAMS)	Hearing Date: November 15, 2012
)	Time: 2:00 p.m.
15 Defendants.)	
16)	
17)	

18 The above-captioned matter is set on November 15, 2012 before this Court for a status
19 hearing. The parties jointly request that the Court continue the matter to December 20, 2012, and
20 that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between November
21 15, 2012 and December 20, 2012, so that the defense can complete its review of the discovery,
22 investigate the case and to calculate the sentencing Guidelines.

23 On August 2, 2012, the Grand Jury charged Deron Williams with one count of bank
24 robbery and ten counts of armed bank robbery, violations of Title 18, United States Code,
25 Sections 2113 (a) and (d). On the most serious charges, Mr. Williams faces a maximum of 20 to
26 25 years imprisonment on each count. Mr. Williams had private counsel until late September

1 2012 at which point the Federal Public Defender was appointed to represent Mr. Williams.

2 The government has produced extensive discovery in this case, including approximately
3 one thousand pages of records, videos, photographs and complex DNA reports. The government
4 continues to produce discovery as it is received.

5 The defense continues to review this discovery and needs more time to investigate the 10
6 robberies charged in the Indictment. For example, the defense would like additional time to
7 assess the DNA evidence produced in this case and the findings from the government lab. The
8 defense also needs to conduct an evidence view and plans to collect records to research Mr.
9 Williams' anticipated Sentencing Guidelines range. For these reasons, the defense requests
10 additional time to review the discovery and to continue the defense investigation.

11 The parties stipulate and agree that the ends of justice served by this continuance
12 outweigh the best interest of the public and the defendant in a speedy trial. The parties further
13 agree that the failure to grant this continuance would unreasonably deny counsel for defendant
14 the reasonable time necessary for effective preparation, taking into account the exercise of due
15 diligence. Accordingly, the parties agree that the period of time from November 15, 2012 until
16 December 20, 2012, should be excluded in accordance with the provisions of the Speedy Trial
17 Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking
18 into account the exercise of due diligence.

19 DATED: November 13, 2012

_____/S/
JAMES C. MANN
Assistant United States Attorney

22 DATED: November 13, 2012

_____/S/
ANGELA M. HANSEN
Assistant Federal Public Defender

1 **ORDER**

2 Based on the reasons provided in the stipulation of the parties above, the Court hereby
3 FINDS:

4 1. Given that the government has produced discovery to defendant that includes
5 voluminous records, video files and DNA discovery that the defense needs to review, and given
6 that the government continues to produce discovery as it is received;

7 2. Given the defense need to complete its investigation of the ten bank robberies
8 charged in this case;

9 3. Given the defense need to collect records and to research the Sentencing
10 Guidelines range;

11 4. Given that these above-listed tasks are necessary to the defense preparation of the
12 case and that the failure to grant the requested continuance would unreasonably deny counsel for
13 defendant the reasonable time necessary for effective preparation, taking into account the
14 exercise of due diligence;

15 5. Given that the ends of justice served by this continuance outweigh the best
16 interest of the public and the defendant in a speedy trial;

17 Based on these findings, IT IS HEREBY ORDERED that the status date of November
18 15, 2012 is vacated and reset for December 20, 2012, at 2:00 p.m. It is FURTHER ORDERED
19 that time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv),
20 from November 15, 2012 until December 20, 2012.

21
22 November 14, 2012

23 
24 YVONNE GONZALEZ ROGERS
25 United States District Judge
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